



July 18, 2017



Mr. Andrew R. Smarick, President  
Maryland State Board of Education  
200 West Baltimore Street  
Baltimore, Maryland 21201

Dear Mr. Smarick:

Montgomery County Public Schools (MCPS) appreciates the opportunity to comment on Draft #2 of Maryland's Consolidated State Plan to implement the *Every Student Succeeds Act of 2015* (ESSA). Stakeholder input is vitally important for providing a robust accountability plan that will meet the needs of all of Maryland's students while ensuring a fair, equitable, and high-quality education and close educational achievement gaps.

MCPS respectfully submits the following key comments and recommendations for consideration as the Maryland State Board of Education gathers additional input from school districts and other stakeholders in preparation for the September 18, 2017, deadline to submit the final draft to the U.S. Department of Education. While we have pointed out key areas of concern, there is notable agreement on many aspects of the Draft #2 Plan. Where concerns are noted, recommendations have been provided for the State Board's consideration.

**Topic: Long-Term Goals and Annual Measurements of Interim Progress**

*Comment 1:*

The State Board should set more ambitious long-term goals and annual measurements of interim progress. MCPS recognizes the importance of ensuring that the state goals are achievable, and, indeed, this recognition is an important improvement that ESSA permits, in comparison to the *No Child Left Behind Act of 2001*. Yet we fear that we will lower standards if we only are aiming at reducing non-proficient students by half by the year 2030, which is the long-term goal set forth in the Draft #2 Plan.

*Comment 2:*

The Draft #2 Plan effectively proposes different goals and annual measures for each racial and ethnic subgroup. While the Draft #2 Plan expects some degree of achievement gap narrowing between student group populations, progress for the lowest performing subgroups needs to be significantly accelerated to ensure equitable opportunities and success for all students. The ultimate goals for academic achievement and graduation rates, for example, should be consistent, achievable standards across the state, and we should expect all students from all racial and ethnic groups to be able to meet, or come very close

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to meeting, those standards by 2030. This requires acceleration of the work to close gaps for certain subgroups at a faster rate to meet the standard. To do what the state proposes seems to embrace mediocrity while accepting the fallacy that some students will be unable to meet these consistent, achievable standards by the 2030 target year.

*Recommendation:*

To avoid any claim of lowering expectations for certain groups, the state should calculate accelerated targets using consistent, achievable standards for all subgroups. At a minimum, the state should use the combined average of the two highest groups of students as a starting point, and reevaluate every two or three years to ensure that the standard continues to be both rigorous and achievable for all students.

**Topic: High School Math Assessments-Academic Achievement**

*Comment 1:*

The Maryland State Department of Education (MSDE) must provide more meaningful alternatives to a Partnership for Assessment of Readiness for College and Careers math assessment for high school students who satisfy the high school federal accountability requirement while in middle school. A more meaningful assessment alternative, such as the SAT, International Baccalaureate (IB), or Advanced Placement (AP), would better position students for their future and help ease the tensions caused by too much assessment that recently resulted in overwhelming legislative support for the *More Learning, Less Testing Act of 2017*.

*Comment 2:*

There are a number of students in MCPS, as well as elsewhere in the state, who take Algebra I in middle school, and some who also take Geometry and even Algebra II. Without an alternative option specified in the plan, accelerated students will be unable to meet the federal requirement of taking a specific math assessment while in high school.

*Recommendation:*

MSDE should propose the SAT, IB, and AP as alternative instruments for the purpose of satisfying the high school math assessment requirement of ESSA.

**Topic: Ranking of Schools Using the Accountability Framework**

*Comment 1:*

MCPS supports the broad concepts in the accountability framework proposed in the Draft #2 Plan.

*Comment 2:*

However, the five-star methodology is too limited to represent the complex nature of our state's schools, and it undermines the multiple measures approach encouraged by ESSA and the *Protect Our Schools Act of 2017*.

*Comment 3:*

The proposed weighted methodology for awarding stars is tantamount to grading schools on a curve, with insufficient and perhaps negligible gradation for the multiple contexts and circumstances representative our state's schools.

*Recommendation 1:*

The State Board should retain the accountability framework that has been developed during the past months as a reasonable accommodation of the many stakeholder perspectives, as well as the requirement of the *Protect Our Schools Act of 2017*.

*Recommendation 2:*

The State Board should not adopt the five-star approach to representing school progress. Instead, the State Board should separately report each school's and each student subgroup's results for each of the academic and school quality indicators in the accountability framework. Schools also should receive an overall score out of 100, and they can be ranked based on that score within each level: elementary, middle, and high.

*Recommendation 3:*

If the State Board does adopt a five-star approach to represent a school's progress, the awarding of stars should be applied based on unweighted and predetermined standards. For example, a quintile ranking associated with the five-star rating would be easily understood by stakeholders.

*Recommendation 4:*

Given the natural tendency to associate a five-star rating with an A–F rating system, there must be a broad communication plan to help stakeholders understand that the five-star rating system is not intended to have an A–F interpretation, an interpretation violating the *Protect Our Schools Act of 2017*.

**Topic: Incorporating of Equity Measures into the Accountability Framework***Comment 1:*

We support the general concept of considering equity for meaningfully differentiating among schools based on gaps in subgroup performance.

*Comment 2:*

However, the equity measure proposed in the Draft #2 Plan n appears to compare subgroup performance within a school to the school's performance overall, which may have the unintended impact of disadvantaging diverse, integrated schools with multiple different subgroups, rather than reporting in a manner that would provide a sense of urgency for providing accelerated opportunities for all students.

*Recommendation 1:*

Equity gaps should be measured in comparison to consistent, rigorous standards at the district and state levels, as well as at the school levels, and all three measures should be reported publicly.

*Recommendation 2:*

As previously discussed, a five-star approach to representing a school's progress would not be necessary if there was consideration given to taking away some number of points from the 100-point total, and using a 100-point scale also could allow for a more nuanced approach (e.g., a certain number of points reduction for large equity gaps for racial and ethnic subgroups, and a separate reduction for gaps for students receiving special education services and/or English language learners), rather than just a reduction of a single star for equity concerns.

*Recommendation 3:*

While the equity measure is a critical element of the Draft #2 Plan, there should be consideration given to displaying a school's calculation before and after any equity calculation is factored into the school's score. In the interest of transparency, there should be a separate reporting of the academic and school factors.

*Recommendation 4:*

The accountability framework should provide the opportunity for reporting and analysis by gender. This is critically important in the arena of access and successful completion of a well-rounded curriculum and for considerations regarding gender performance within subgroups.

**Topic: Access to a Well-Rounded Curriculum Indicator**

One of the school quality measures proposed in the Draft #2 Plan is access to a well-rounded curriculum. While MCPS appreciates ESSA's acknowledgment of the importance of providing access to a well-rounded curriculum as a critical equity measure, we have some concerns with the specific metrics proposed in the the Draft #2 Plan for each school level.

*Comment 1:*

*Elementary School:* The state's proposed metric for access to a well-rounded curriculum in elementary school is: Percent of Grade 5 students enrolled in Science, Social Studies, Fine Arts, Physical Education, and Health. The integrated nature of MCPS' elementary school instructional program does not specifically allow for a separate reported course or grade for health. The health content is generally integrated into social studies and/or science courses.

*Comment 2:*

*Middle School:* The state's proposed metric for access to a well-rounded curriculum in middle school is: Students enrolled in Fine Arts, Physical Education, Health, and computational learning. This definition should be clearly specified, especially with respect to what qualifies as computational learning, which is not a separate course in the state's current curriculum standards.

*Comment 3:*

*High School:* The state's proposed metric for access to a well-rounded curriculum in high school is: Percent of students graduating who were enrolled in an AP or IB course; participated in dual enrollment; or completed a Career and Technology Education (CTE) concentration. Additional indicators should be added at the high school level to acknowledge the variety of other pathways that students may access as they prepare for college and careers.

*Recommendation 1:*

*Elementary School:* Remove health from the list associated with elementary school access to a well-rounded curriculum indicator.

*Recommendation 2:*

*Middle School:* Clarify the definitions of what courses qualify, especially for computational learning.

*Recommendation 3:*

*High School:* The Seal of Biliteracy is a viable additional consideration. In addition, locally defined rigorous programs such as Junior Reserve Officers Training Corps, Project Lead the Way, CTE Credentialing Programs, and Magnet Programs in arts and other subjects could be added as measures of a well-rounded high school.

*Recommendation 4:*

At all levels, it is critical that MSDE does not add any further coursework requirements, to preserve flexibility, individuation, and innovation in course offerings and scheduling developed by local school districts across the state.

**Topic: Climate Survey**

*Comment 1:*

We support the need to have a state climate survey that is comparable across jurisdictions in Maryland.

*Comment 2:*

It is important that school districts have the flexibility to customize the survey to their unique needs by adding additional questions; therefore, the length of the state's climate survey is a critical consideration.

*Recommendation 1:*

Local administration of the state's climate survey is important for maximizing participation as opposed to the state administering the survey, as was the case for the Teaching, Empowerment, Leading and Learning survey.

*Recommendation 2:*

The overall length of the state climate survey should be restricted to no more than 25 minutes, including any customized local portions, and the state portion should account for no more than one half of the total, to allow the opportunity for school districts to include their own additional questions consistent with their unique needs.

*Recommendation 3:*

Each local education agency should administer its survey with a file transfer of the results for the state portion.

Thank you for your consideration and subsequent action to address the comments and concerns that have been raised on behalf of Montgomery County Public Schools. If you have any questions regarding the content of this correspondence, please contact Mr. Joshua I. Civil, general counsel, at 240-314-4840; Dr. Janet S. Wilson, associate superintendent for shared accountability, at 301-279-3448; or me, at 301-279-3383.

I appreciate all of the work you do on behalf of Maryland's students.

Sincerely,



Jack R. Smith, Ph.D.  
Superintendent of Schools

JRS:HRJ:JSW:lgp

Copy to:

Members of the Board of Education

Executive Staff

Mr. Ikheloa